



April 26, 2017

Mia Marvelli, Executive Director
California Building Standards Commission
2525 Natomas Park Drive, Suite 130
Sacramento, CA 95833

Re: Department of Water Resources' Proposed Amendments to 2016 Plumbing Code

Dear Ms. Marvelli:

The San Francisco Public Utilities Commission and the San Francisco Department of Public Health appreciates the opportunity to provide comments on the 45-day Express Terms for Proposed Building Standards of the Department of Water Resources Regarding Proposed Changes to 2016 California Plumbing Code (CA Code of Regulations, Title 24, Part 5).

We object to the change proposed for Chapter 16, section 1602.4 that eliminates the option to use a Reduced Pressure Principle (RP) device to protect against cross-connections with rainwater systems.

This change would place an unnecessary burden on rainwater systems because it unnecessarily forces them to forgo the benefit of using distribution system pressure to move water efficiently through their buildings when utilizing makeup water. There is no public health benefit for this requirement, because rainwater is not a contaminant that poses a lethal hazard.

Additionally, requiring an air gap for non-potable rainwater systems would make the California Plumbing Code inconsistent with the Uniform Plumbing Code. Chapter 16, section 1602.4 of the Uniform Plumbing Code allows for the use of an air gap or RP to protect the point of connection at the make-up water line.

Existing language in the California Plumbing Code appropriately allows for either an air gap or RP for non-potable rainwater systems and is consistent with the University of Southern California (USC) Manual of Cross-Connection Control.

The City and County of San Francisco regulates cross-connection devices and rainwater systems for non-potable applications under San Francisco Health Code Articles 12A and 12C. Where rainwater systems are installed, we require an RP device within 25 feet of the service connection as well as a second RP device at the point of use where the makeup water is provided. This provides redundant fail-safe protection in the event of a backflow or backsiphonage situation.

The City and County of San Francisco requests that the California Building Standards Commission retain the existing language in Chapter 16, Section 1602.4 of the California Plumbing Code, which reads: "...Potable or reclaimed (recycled) water is permitted to be used as makeup water for a non-pressurized rainwater catchment system storage tank provided the potable or makeup reclaimed (recycled) water supply inlet connection is protected by an airgap or reduced-pressure principle backflow preventer in accordance with this code."

Thank you for considering our comments.

Sincerely,



for Steven R. Ritchie
Assistant General Manager, Water
San Francisco Public Utilities Commission



Stephanie Cushing
Director of Environmental Health
San Francisco Department of Public Health